## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RAFAEL GARCIA :

:

Plaintiff,

Civil Action No. 2:24-cv-06316

VS.

:

CITY OF PHILADELPHIA;

BRIDGET L. KIRN; and

JOHN/JANE DOE(S) #1 - #10 : JURY TRIAL DEMANDED

:

Defendants. :

## PLAINTIFF'S NOTICE OF INTENT TO AMEND COMPLAINT

Plaintiff files this Notice pursuant to Local Rule of Civil Procedure 7.1(c) to notify this Honorable Court and all parties hereto that Plaintiff will file an Amended Complaint pursuant to Federal Rule of Civil Procedure 15 and the timeframe(s) set forth therein.

Respectfully submitted,

THE BEASLEY FIRM, LLC

BY: <u>/s/ Dion G. Rassias</u>

DION G. RASSIAS, ESQUIRE

1125 Walnut Street Philadelphia, PA 19107

(215) 592-1000

(215) 592-8360 (facsimile)

DATED: March 24, 2025

## **CERTIFICATE OF SERVICE**

Dion G. Rassias, Esquire, hereby certifies that on this date, a true and correct copy of the foregoing was sent to the below-listed individuals, via ECF:

Aleena Y. Sorathia, Esquire Katelyn L. Mays, Esquire Ahmad Zaffarese LLC One South Broad Street, Suite 1910 Philadelphia, PA 19107 Attorneys for Defendant City of Philadelphia

Shelley R. Smith, Esquire
Archer & Greiner, P.C.
Three Logan Square
1717 Arch Street, Suite 3500
Philadelphia, PA 19103
Attorneys for Defendant Bridget L. Kirn

## THE BEASLEY FIRM, LLC

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